

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

AMENDED MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on June 30, 2015, request this Court enter judgment against Defendant, STARLIGHT EVENTS, LLC, d/b/a SCORES, at TRUMP TAJ MAHAL. In support of that Motion, Plaintiffs state:

1. On June 30, 2015, this Court entered default against Defendant and set the matter for prove-up on August 12, 2015.
2. On August 5, 2015, Plaintiffs filed its Motion for Entry of Judgment and set the motion for hearing on August 12, 2015.
3. On August 12, 2015, this Court entered and continued Plaintiffs' Motion for Entry of Judgment to September 15, 2015 at 9:15 a.m.
4. Defendant submitted its monthly fringe benefit contribution reports for June 2015 and July 2015 but failed to remit the contributions due in the amount of \$14,498.69. (See Affidavit of Dean Dailey).

5. Defendant remitted its monthly fringe benefit contribution reports for the work months of March 2015 through July 2015 but untimely remitted payment of the contributions due thereon and accordingly has incurred accrued interest and liquidated damages calculated through September 8, 2015 totaling \$336.16.

6. In addition, Plaintiffs' firm has expended \$1,090.00 in costs and \$2,815.00 in attorneys' fees, for a total of \$3,905.00, in this matter. (See Affidavit of Laura M. Finnegan).

7. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$18,739.85.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$18,739.85.

/s/ Laura M. Finnegan

Laura M. Finnegan
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Amended Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have served the above-referenced document by facsimile and US Mail to the following non-CM/ECF participant on or before the hour of 4:00 p.m. this 14th day of September 2015:

Mr. Mark Yackow
Starlight Events, LLC
d/b/a at Scores at Trump Taj Mahal
1000 Boardwalk, 2nd Floor
Atlantic City, NJ 08401
my@pecnyc.com

/s/ Laura M. Finnegan

Laura M. Finnegan
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